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6  
7 Attorney for Mauricio Martinez-Perez

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11  
12 Plaintiff,  
13 v.  
14 MAURICIO MARTINEZ-PEREZ,  
15 Defendant.

Case No. 2:21-cr-00104-JCM-EJY

**STIPULATION TO CONTINUE  
REVOCATION HEARING**  
(First Request)

16  
17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,  
18 United States Attorney, and Allison Reese, Assistant United States Attorney, counsel for the  
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Jacquelyn N.  
20 Witt, Assistant Federal Public Defender, counsel for Mauricio Martinez-Perez, that the  
21 Revocation Hearing currently scheduled on April 12, 2023, be vacated and continued to a date  
22 and time convenient to the Court, but no sooner than sixty (60) days.

23 This Stipulation is entered into for the following reasons:

- 24 1. Defense counsel will be out of the jurisdiction on the date this revocation hearing  
25 is currently set.  
26 2. Defense counsel needs additional time to discuss this matter with Mr. Martinez-  
Perez and conduct necessary investigation as to the allegations in the Petition.

1           3.       Mr. Martinez-Perez is in custody and agrees with the need to continue the  
2 hearing

3           4.       The parties agree to the continuance.

4           This is the first request for a continuance of the revocation hearing.

5           DATED this 4<sup>th</sup> day of April, 2023.

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7           RENE L. VALLADARES  
8 Federal Public Defender

JASON M. FRIERSON  
United States Attorney

9           By /s/ Jacquelyn N. Witt

By /s/ Allison Reese

10          JACQUELYN N. WITT  
11 Assistant Federal Public Defender

ALLISON REESE  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 MAURICIO MARTINEZ-PEREZ,

7 Defendant.

Case No. 2:21-cr-00104-JCM-EJY

**ORDER**

9  
10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled  
11 for Wednesday, April 12, 2023 at 10:30 a.m., be vacated and continued to **June 12, 2023, at**  
12 **10:30 a.m.**; or to a time and date convenient to the court.

13 DATED April 5, 2023.

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15   
16 UNITED STATES DISTRICT JUDGE